

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

Jocelyn Moore,)
)
Plaintiff,)
)
-vs-) No. 15-cv-_____
)
Lynwood Police Officer Luke) (jury demand)
Tambrini, Star 109,)
)
Defendant.)

COMPLAINT

Plaintiff Jocelyn Moore, by counsel, alleges as follows:

1. This is a civil action arising under 42 U.S.C. § 1983. Plaintiff invokes the jurisdiction of this Court pursuant to 28 U.C.C. § 1343.
2. Plaintiff Jocelyn Moore is a resident of the Northern District of Illinois.
3. Defendant Luke Tambrini was at all times relevant acting under color of his authority as a police officer of the Village of Lynwood, Illinois. Plaintiff sues Tambrini in his individual capacity.
4. On the morning of February 11, 2013, Plaintiff stopped for gas at the Lynwood Express gas station on Glenwood Dyer Road in Lynwood. Plaintiff went into the station to pre-pay for her fuel. Tambrini entered the store and ordered Plaintiff to return to her car. Plaintiff complied.

5. After arriving at plaintiff's vehicle, Tambrini instructed plaintiff to produce her insurance card and to place her hands on the vehicle. Plaintiff complied with these commands. Tambrini then told Plaintiff that he was arresting her for driving on a suspended license.

6. Defendant Tambrini used excessive and unreasonable force in placing plaintiff under arrest, twisting and breaking plaintiff's arm and causing plaintiff to suffer emotional harm.

7. Plaintiff hereby demands trial by jury.

WHEREFORE Plaintiff requests that judgment be entered against defendant Tambrini for appropriate compensatory and punitive damages.

/s/ Kenneth N. Flaxman
KENNETH N. FLAXMAN
ARDC No. 830399
Joel A. Flaxman
200 S Michigan Ave Ste 201
Chicago, IL 60604-2407
(312) 427-3200

Matthew Robison
140 S. Dearborn St., Ste 404
Chicago, IL 60603
(773) 672-7400

attorneys for plaintiff